## RE: RM-10687 - Frequency Cordination

A long time ago the FCC did its own frequency cordination for frequencys below 402 Mhz. The task of some UHF frequencys were marked "General use" or "Itinerant" witch required no actual cordination with the only require for cordination from Mexico, and Canada. Witch from a stand point the FCC did a poor job in so called International Cordination in the HF, VHF low Band, and VHF High Band, as well as the coordination above 402 Mhz.

However the present day so called frequency cordination was extended to the frequencies above 30 Mhz, as a Money Making Sham to make a small dog and pony show to look as if true frequency management was taking place! Frequency Cordination of today is more a less a buy your share of the spectrum, and establishes the first, second, third, and so on user for frequency use! In most case its just a private radio loging service as who was first to a frequency or band of frequencys so if later complaints arrise the late to apply would have to fix the interference to the lesser's!

Yes as bad as it is the FCC need's to keep frequency cordination, but assign a task force to fix it's ongoing short falls!

The old concept of several "General Use" frequencys that could be used or licensed aware in the US without frequency cordination should be re-visited. In the IB business band between 25 Mhz and 50 Mhz there were (4) sutch General Use Channels, and (2) Itinerant. There were (2) General use Frequency's for IB in the VHF high Band, and (1) Itenerant! In the UHF Band from 450 Mhz to 470 Mhz there were (4) General Use, and (4) Itinerant! This only involves the the IB section, Other various services also had the so called "General Use" channels, witch in most case also had the highest RF power output per band! Congestion was bad in most Metro Citys, however operation through out the rest of the cuntry was mutch like rual radio use to be!

The "General Use" frequencys for IB were easy for large companys to set up operations on the same frequency in a start up area and later when they expanded to a new they were not faced with a new set of cordination problems.

With todays modern "wide band" commerical VHF & UHF radios it would\ be a advantage to re-establish some "General Use" frequencys that don't need the "Frequency Cordination" restraints to help establish rappid new systems in new areas. The FCC states users must share channels.

This is the time the FCC needs to think about "Dual" frequency corrdination on present frequency plans! The Cell phone service to citizen has both a A & B provider, The SMR mostly one company witch is trying to act as a "C" provider with radio service / telephone service in a cell phone look alike, and the 5 area PCS providers per area provides the end users with 8 companys in major metro areas to provide cell phone service.

In frequency coordination the vendors are more or less limited to "one" acutal vendor for several radio services. The price is to "Stiff", There is no real compinition for frequency coordination that why the fees are so stiff.

This is the leading cause that small vendors don't apply for cordination, and sometimes operate for years with out FCC license!

There is noted Illegal Radio Use by small time vendors on Federal Frequencys, Police Frequencys, Ham Frequencys, Who are elegible for corrdination in this area the RM-10687 wishes to change.

Illegal Operation on Frequencys just outside of the Commerial Radio Bands in the area of 174 to 180 Mhz is common in metro area of the country. Illegal Operation on frequencys between 29.7 and 31 Mhz are common on Low Band. Illegal opertion on the 48 Mhz to 50 Mhz of various service is also to common. There is a growing number of VHF operators who are using 157 Mhz to 160 Mhz marine radios in in-Land Illegal operation.

One operation near me is a group of TruckDrivers using 156.800 and 156.300 Mhz for truck to truck communications to avoid the State Public Utility Weight Over Load Inspectors. General They run 1 Watt, but hop from channel to channel on a daily basis to avoid FCC detection! Frequency Coordination is very over priced for the small business man! Dual cordinatiors, or even more than dual per service is need sharing the data bases!

The FCC field inspectors, and local Law enforcment have know about the use of Marine Radios for Some time, from Inland Illegal Mobiles that cause intererence to International Marine Radio Safety Frequencys!

They do catch the fellows for the "over load" of there trucks but they keep there radios, pay there fines to the local courts, and the Ohio Public Utility over load inspectors keep monitoring the Marine Radio! It's too bad the PUCO inspectors can't get the FCC to act! The Coast Guard some times dose better work of tracing down Illegal land use of marine radio than the FCC according to news reports on FOX-TV stations!

The FCC need's to make serious changes, so that eary start up radio end users on a limited number for frquencys with small mobile fleets can get on the air LEGAL without a heavy FEE for frequency cordination, or heavy FCC license FEE!

Soryy for typos this Spell checker is not working today, but I think the needs can be understood!

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